

Magistrate Judge Theresa L. Fricke

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,
Plaintiff,

v.

BRANDON RONALD COLLADO,
Defendant.

CASE NO. 3:22-mj-05299

COMPLAINT for VIOLATION

Title 18, U.S.C.

Sections 844(i), 844(h), 2113(a), and 2

BEFORE, THERESA L. FRICKE, United States Magistrate Judge, U. S.
Courthouse, Tacoma, Washington.

The undersigned complainant being duly sworn states:

COUNT ONE

ARSON

On or about October 24, 2022, at Tumwater, in the Western District of
Washington, BRANDON RONALD COLLADO did maliciously damage and destroy,
and attempt to damage and destroy, by means of fire, a building used by O Bee Credit

1 Union in interstate and foreign commerce and in an activity affecting interstate and
2 foreign commerce, and did aid and abet such offense.

3 All in violation of Title 18, United States Code, Sections 844(i) and 2.

4 **COUNT TWO**

5 **BURGLARY OF A FEDERALLY INSURED CREDIT UNION**

6 On or about October 24, 2022, at Tumwater, in the Western District of
7 Washington, BRANDON RONALD COLLADO did attempt to enter the O Bee Credit
8 Union, such credit union being federally insured by the National Credit Union
9 Administration, with the intent to commit in such credit union, a larceny, and did aid and
10 abet such offense.

11 All in violation of Title 18, United States Code, Sections 2113(a) and 2.

12 **COUNT THREE**

13 **USE OF FIRE TO COMMIT A FELONY**

14 On or about October 24, 2022, at Tumwater, in the Western District of
15 Washington, BRANDON RONALD COLLADO did use fire to commit a felony which
16 may be prosecuted in a court of the United States, namely, Burglary of a Federally
17 Insured Credit Union, as alleged above in Count 2, and did aid and abet such offense.

18 All in violation of Title 18, United States Code, Sections 844(h)(1) and 2.

19 And the complainant states that this Complaint is based on the following
20 information:

21 I, GREGORY HELLER, being first duly sworn on oath, depose and say:

22 1. I am a duly sworn member of the Bureau of Alcohol, Tobacco, Firearms,
23 and Explosives (ATF). I am currently assigned to the ATF Seattle III Field Office located
24 within the Seattle, Washington Field Division. I have been employed as a special agent
25 since September 2014. From 2007 to 2014, I was employed as a police officer and
26 detective in Gwinnett County, Georgia. In total, I have approximately 15 years of state
27 and federal law enforcement experience.

1 2. I am a graduate of Duke University in Durham, North Carolina, where I
2 received a Bachelor of Science in Engineering (B.S.E.) in Civil Engineering. I completed
3 a 12-week Criminal Investigator Training Program (CITP) and a 14-week Special Agent
4 Basic Training (SABT) at the ATF National Academy/ Federal Law Enforcement
5 Training Center (FLETC) in Glynco, Georgia. I also completed a 23-week Gwinnett
6 County Police Training Academy and was a Peace Officer Standards and Training
7 (P.O.S.T.) certified peace officer in the State of Georgia.

8 3. I am currently assigned to the ATF Seattle III Field Office (an arson and
9 explosives group) and primarily conduct investigations related to the criminal use of fire
10 or explosives. I am also responsible for enforcing federal firearms and explosives laws
11 and related statutes in the Western District of Washington. I received training on the
12 proper investigative techniques for these violations. I have actively participated in
13 investigations of criminal activity, including but not limited to crimes against persons,
14 crimes against property, fire and explosive related crimes, and crimes involving the
15 possession, use, theft, or transfer of firearms. During these investigations, I have also
16 participated in the execution of search warrants and the seizure of evidence indicating the
17 presence of criminal violations. As a law enforcement officer, I have testified under oath,
18 sworn to applications for search and arrest warrants, and obtained electronic monitoring
19 orders.

20 4. The facts set forth in this Affidavit are based on my own personal
21 knowledge; information obtained from other individuals during my participation in this
22 investigation, including other law enforcement officers; review of documents and records
23 related to this investigation; communications with others who have personal knowledge
24 of the events and circumstances described herein; and information gained through my
25 training and experience. Because this Affidavit is submitted for the limited purpose of
26 establishing probable cause in support of a criminal complaint, it does not set forth each
27 and every fact that I, or others, have learned during the course of this investigation.

SUMMARY OF PROBABLE CAUSE

5. I am aware of the following based on my interviews of O Bee Credit Union personnel and from a review of publicly available information about O Bee Credit Union. O Bee Credit Union (“O Bee”) is a financial institution that offers personal and business banking services to its customers/ members. O Bee has eight branch locations and additional ATM locations, all within the state of Washington. O Bee is federally insured by the National Credit Union Administration (NCUA.) O Bee offers online banking services and offers credit / debit card services to its members through a national financial transaction card company, Visa.

6. The O Bee branch location at 3900 Cleveland Avenue SE in Tumwater, Washington, offers an inside lobby and counter, a drive-thru window, and an ATM.

7. On October 24, 2022, at 5:54AM, Tumwater Fire Department (TFD) personnel responded to a fire alarm activation at the O Bee branch location at 3900 Cleveland Ave SE in Tumwater, Washington. The first firefighters to arrive saw flames between one and two feet tall coming from the top of the ATM, which was embedded in an exterior wall of the credit union. Firefighters suppressed the flames with fire extinguishers and hose lines. Firefighters also entered the building and found smoke in the interior of the credit union. Firefighters noticed additional damage to the building and requested Tumwater Police Department (TPD) officers respond to investigate a possible break-in attempt.

8. Responding TPD officers observed damage to the ATM, the bank deposit box (also embedded in the exterior wall of the credit union), the drive-thru teller window, and an exterior door to the credit union riser room.¹ The officers noticed both fire and mechanical damage to all the described locations. They noted char marks, what appeared to be flame based cuts, and pry marks. The photos below depict the fire and mechanical

¹ A riser room is essentially the control center for a building’s fire sprinkler system.

1 damage to the ATM (upper left photo) and the deposit box (upper right photo), as well as
2 the fire damage to the drive-thru teller window (lower left photo) and exterior door
3 (lower right photo).



1 9. The nature of the damage to the ATM and night deposit box was consistent
2 with suspects attempting to access the valuables inside. The damage to the teller window
3 and the exterior door was consistent with the suspects attempting to access the interior of
4 the credit union. It did not appear that the suspects had been able successfully gain access
5 to the interior.

6 10. Investigators and credit union personnel subsequently discovered that there
7 was also smoke damage to the interior of the credit union. The credit union had to
8 temporarily close, and the initial damage estimate was more than \$100,000.

9 11. With the assistance of credit union personnel, officers and investigators
10 were able to view and obtain copies of surveillance footage from several exterior
11 cameras. Investigators saw that at approximately 12:46AM on October 24, 2022, a station
12 wagon pulled into the credit union and parked well away from the building in the
13 northeast corner of the parking lot. From their review of the video, investigators believed
14 the suspect vehicle was a medium tone, older model Subaru station wagon with a large
15 luggage rack on top. The photos below are extracted from the surveillance footage. I note
16 what appears to be a luggage rack on top of the vehicle as depicted in the left photo.

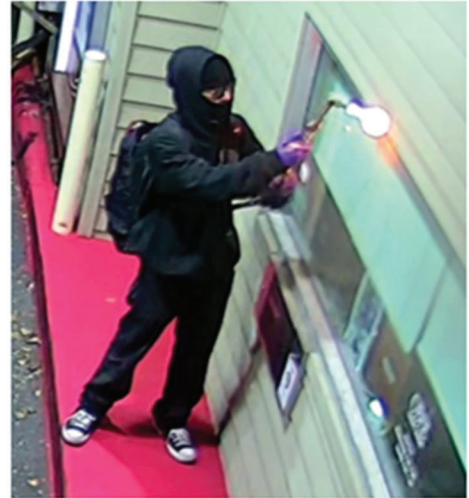


12. When investigators reviewed the video, they saw that between approximately 12:57AM and 5:11 AM, two suspects spent over four hours using hand tools, power tools, and a torch on the ATM, the deposit box, the teller window, and an exterior door. On at least two occasions during that period, the suspects appeared to have left the area in the station wagon and returned with additional tools. Based on the video, the two suspects can be described as follows:

| | |
|------------|--|
| SUSPECT 1: | Gray, white, and black or blue patterned hooded sweatshirt |
| | Gray sweatpants |
| | Gray cap with white circular emblem on the front |
| | Blue face wrap / mask |
| | Black and white patterned shoes with white soles |
| | Long light brown or blond hair |
| | Purple exam-type gloves |
| SUSPECT 2: | Gray or black hooded North Face sweatshirt |
| | Dark pants |
| | Black shoes with white laces, toes, and soles |
| | Black face wrap / mask |
| | Sunglasses and purple exam-type gloves |
| | At times, a brown watch cap |

13. Among other tools, such as pry bars and saws, the suspects had a red and black Bauer brand backpack that contained at least two cylindrical tanks. Red and green tubing ran from those tanks to a handheld torch. This appeared consistent with an oxyacetylene torch system. In such a system, there are at least two tanks. One contains oxygen and the other contains acetylene. Separate tubes allow the two gases to mix at the tip of the torch. The resulting flame burns extremely hot and is useful for cutting or welding. The Bauer backpack with the torch system was primarily worn and used by

SUSPECT 2. The photos below, extracted from the surveillance video, show SUSPECTS 1 and 2 using the torch and tools on the deposit box (left photo) and SUSPECT 2 using the torch on the teller window (right photo).



14. At times, both suspects stood almost directly in front of a camera associated with the ATM. Investigators could see the lower portion of a tattoo on SUSPECT 1's neck, as depicted in the photo below.



1 15. At other points, SUSPECT 2's glasses and mask slipped, showing some of
2 his facial features, including a dark mustache, as depicted in the photos below.



12 16. At a few minutes after 5AM, the ATM could be seen smoking heavily and
13 the two suspects walked around the corner briefly. They then returned, running back in
14 the direction of their vehicle. Shortly thereafter, a customer drove towards the ATM. It
15 appeared to investigators that this customer's approach caused the suspects to abandon
16 their efforts and flee the area.

17 17. Also of note in the video was a radio or scanner that SUSPECT 1 was
18 frequently seen holding near his ear while he and SUSPECT 2 were attempting to use the
19 torch and other tools to access the ATM, deposit box, and the building. Officers located a
20 radio left at the scene, programmed to scan the local police dispatch channels. This led
21 investigators to believe that the suspects were using the radio to determine if an alarm
22 had been tripped and a police response initiated.

23 18. On October 27, 2022, TPD officers were dispatched to a possible weapons
24 violation in the area of 6640 Little Rock Road SW, Tumwater. The reporting party
25 indicated she heard what sounded like a gunshot or explosion coming from the area of
26 6640 Littlerock Road SW. The building at 6640 Littlerock Road SW is an apartment
27 building with a field between the building and the woods behind it.

1 19. When officers arrived, they saw a green Subaru station wagon with
2 Washington license plate BXP7652 in front of the building. It was running and had its
3 lights on. Randall Taufete'e, whom the officers knew from previous contacts, exited the
4 passenger seat. The officers knew Taufete'e was a convicted felon and ineligible to
5 possess firearms. There was a driver in the vehicle as well, but the officers could not see
6 him at that time. Taufete'e said he had not heard any gunshots. Taufete'e was
7 confrontational with the officers and seemed unhappy with their presence, even though
8 the officers told him he could leave if he wanted to.

9 20. Taufete'e got back in the Subaru station wagon, and it began to drive away
10 as officers headed towards the back of the apartment building. Taufete'e then exited the
11 vehicle again. This time the driver also exited, leaving the vehicle parked. Taufete'e tried
12 to discourage the officers from going to the back of the building, claiming that his dog
13 was back there. However, when officers got to the back of the building, there was no dog.
14 Taufete'e then brought a dog out of an apartment, threatening to release it. Officers
15 interpreted Taufete'e's behavior as an attempt to distract them from investigating the
16 weapons complaint.

17 21. In the grass behind the building, the officers saw items and tools strewn
18 about, including several welders and torches. There was a large tent with mesh sides in
19 which the officers saw a large safe. The officers observed that the door to the safe
20 appeared to have been cut with a torch and either pried or blown open. The officers did
21 not enter the tent but photographed the safe and the other items strewn about.

22 22. The officers were aware that there had been a recent incident in which
23 suspects had used blowtorches to try to open ATMs, so one of them photographed the
24 vehicles in the parking lot for future comparison to suspect vehicles. From outside the
25 vehicle, an officer looked into the now unoccupied Subaru station wagon and could see a
26 pistol on the passenger floorboard where Taufete'e had been sitting. At one point,
27

1 Taufete'e also asked officers if he could retrieve his blue bag out of the passenger seat.
2 Officers saw that the blue bag was on the passenger floorboard next to the pistol.

3 23. The officers detained Taufete'e for unlawful possession of a firearm. An
4 officer applied for and obtained a telephonic search warrant for the Subaru station wagon.
5 The officers recovered a Sig Sauer Model P226 9x19mm pistol with serial number
6 47C029305. The pistol was loaded with five rounds, including a round in the chamber.
7 The officers checked the serial number and determined the pistol had been reported
8 stolen in Kent, Washington in 2021.

9 24. The officers then arrested Taufete'e.² The driver never identified himself to
10 officers, but the officers conducted a history check of the vehicle and found that
11 BRANDON RONALD COLLADO had previously been contacted in that vehicle.
12 Officers reviewed photos of COLLADO and believed the man depicted in COLLADO's
13 driver's license photo matched the presumed driver who had been standing with
14 Taufete'e and conversing with officers. Officers left the vehicle in place after the search
15 warrant was concluded.

16 25. On October 30, 2022, TPD detectives investigating the O Bee Credit Union
17 incident returned to 6640 Little Rock Road SW and located the Subaru station wagon
18 with license plate BXP7652 (depicted on the next page). They noticed that it appeared to
19 match the suspect vehicle from the credit union incident and had a roof mounted luggage
20 rack that appeared to match the one seen on surveillance video at the credit union. While
21 standing outside the vehicle, the detectives saw a red and black Bauer backpack inside
22 that matched the one SUSPECT 2 was seen wearing in the surveillance video and which
23 had contained the oxyacetylene torch system.

24
25
26 ² Taufete'e was convicted on November 21, 2022, in Thurston County Superior Court of Unlawful Possession of a
27 Firearm (Second Degree) and is serving a 27.75-month prison term.



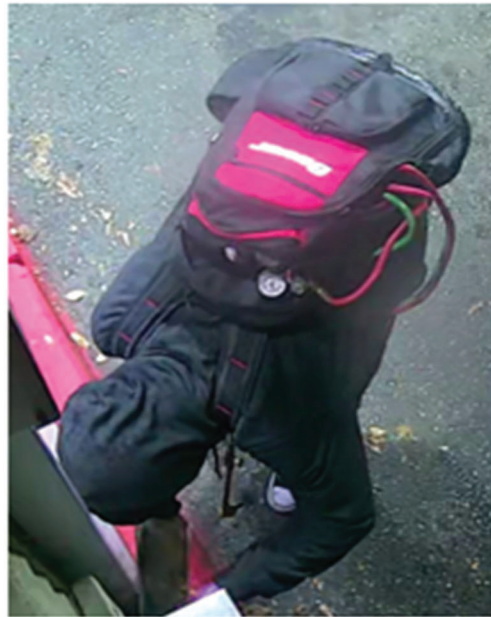
26. Upon subsequent further comparison of the Subaru station wagon (WA/BXP7652) to the suspect vehicle in the surveillance video, investigators noticed two additional features (in addition to the luggage rack) that appeared to match. Investigators noticed that in the video an irregularity is visible above the passenger side rear wheel well; in the video it is unclear if it is a dent, scratch, sticker, or other mark. When investigators examined the Subaru, they saw it had rust damage above the passenger side rear wheel well. Investigators also saw that the Subaru had a trailer hitch with a shiny, silver colored ball mount. When investigators examined surveillance footage, they could see that the suspect vehicle also appeared to have a similar hitch. Photos of the Subaru station wagon (WA/BXP7652) showing its rust damage and trailer hitch, and comparison still shots from the surveillance video appear on the next page.



27. The detectives impounded the Subaru station wagon and obtained a search warrant for it. On October 31, 2022, detectives searched the vehicle. They found numerous hand and power tools including pry bars. They recovered the Bauer backpack as well as several cylindrical tanks including oxygen, acetylene, and nitrogen. They also recovered purple exam type gloves which matched those worn by both suspects in the surveillance video, and black and white shoes that appeared to match those worn by SUSPECT 2 in the surveillance video. Photos of the recovered backpack and shoes, with comparison still shots from the surveillance video appear on the next page.



Recovered Backpack



Surveillance Video



Recovered Shoes

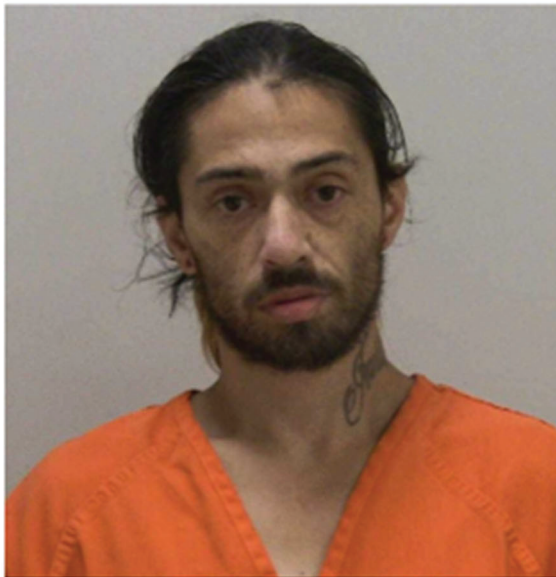


Surveillance Video

28. Inside the Subaru station wagon, investigators also found mail addressed to COLLADO and COLLADO's Social Security card. Washington Department of Licensing (DOL) records show that the Subaru station wagon (WA/BXP7652) is registered to an individual with the initials J.J.G. I have reviewed Lacey Police

Department (LPD) records which show that on September 10, 2022, officers contacted COLLADO in the Subaru. The records described COLLADO as J.J.G.'s brother.

29. Investigators compared DOL and booking photographs of COLLADO to the surveillance video of SUSPECT 1. Although SUSPECT 1 was masked, his eyes and nose were visible in the surveillance video and COLLADO's facial features appeared to match what could be seen of SUSPECT 1. Additionally, in his most recent booking photograph, COLLADO had long hair that was a mixture of brown and blond, which also appeared consistent with SUSPECT 1 in the surveillance video. COLLADO's DOL photograph and booking photographs show he has lettering tattooed on the left side of the neck. The curly section of the first letter appears to be in the same location and matches the portion of SUSPECT 1's tattoo that can be seen beneath SUSPECT 1's mask, as shown in the photos below.



COLLADO Booking photo from 10/13/22




SUSPECT 1

30. Investigators also located LPD report 2022-04583, in which a Lacey Police officer was investigating a burglary that took place on September 10, 2022. As part of his report, the officer noted that on the day of the burglary he had contact with COLLADO

1 and that COLLADO was wearing a distinctively patterned sweater. On November 3,
 2 2022, investigators met with that officer and showed him photographs of SUSPECT 1
 3 from the credit union surveillance video. The officer recognized the top SUSPECT 1 is
 4 wearing in the video as the same one COLLADO was wearing when the officer contacted
 5 him on September 10, 2022.

6 31. Based on the above facts, I respectfully submit that there is probable cause
 7 to believe that BRANDON RONALD COLLADO is SUSPECT 1 and that he did
 8 knowingly and intentionally commit, and aid and abet the commission of, the crimes of
 9 arson, use of fire to commit a felony, and burglary of a federally insured credit union, all
 10 in violation of Title 18, United States Code, Sections 844(i), 844 (h)(1), 2113(a), and 2.

11 32. I am submitting this Affidavit and Complaint by reliable electronic means
 12 pursuant to Federal Rules of Criminal Procedure 4.1 and 41(d)(3).

13
 14  Digitally signed by
 15 GREGORY HELLER
 16 Date: 2022.12.16
 17 11:38:35 -08'00'
 18 GREGORY HELLER, Complainant
 19 Special Agent, ATF

18 The above agent provided a sworn statement attesting to the truth of the contents
 19 of the foregoing Affidavit and Complaint on the 20th day of December 2022. Based on
 20 the sworn statement and Complaint, the Court hereby finds that there is probable cause to
 21 believe the Defendant committed the offenses set forth in the Complaint.

22 Dated this 20th day of December 2022.

23
 24 
 25 THERESA L. FRICKE
 26 United States Magistrate Judge
 27